

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal Case No.: 4:17-CR-131-DMB-1
	)	
SCOTT E. NELSON	)	
_____	)	

**MOTION TO EXTEND DEADLINE TO FILE  
OBJECTIONS TO PRESENTENCE INVESTIGATIVE REPORT**

**COMES NOW** the Defendant, SCOTT E. NELSON, by and through his undersigned counsel, and respectfully moves the Court for an extension of time in which to file his objections to the *Presentence Investigative Report* in the above -styled and numbered cause, and in support thereof would state as follows:

1. The Defendant received the *Presentence Investigative Report* on June 21, 2022 from Andrew Fountain, U.S. Probation Officer.
2. The Defendant previously requested and was granted an extension for filing objections to the *Presentence Investigative Report*.
3. The Defendant anticipates a significant variance between the Government's loss figures as presented in the *Initial Presentence Report* and the actual loss figures to the Government. In order to show the actual loss figures to the Government; however, the Defendant is required to analyze each and every patient certified or presumably certified by Dr. Nelson in generating the loss figures to the Government and the actual amounts billed to Medicare and Medicaid.
4. The Defendant has been diligently working on this report; however, due to the volume of patients and billings to Medicare and Medicaid, he simply has not had sufficient time to complete same.

5. In addition, the Defendant anticipates that once this report is completed, there is a possibility of reaching an agreement as to the actual loss figures.

6. The Defendant would request an additional 10-day extension to file his objections.

7. The Defendant does not anticipate that this will affect the current sentencing date of September 14, 2022, and would therefore respectfully request additional time to effectively complete the above-mentioned calculations.

8. The Defendant advises that Clayton A. Dabbs, Esq., Assistant United States Attorney, has been consulted and has no objection to the *Motion to Extend Deadline to File Objections to Presentence Investigative Report* filed by Defendant in this matter.

**WHEREFORE, PREMISES CONSIDERED,** the Defendant respectfully requests an additional two weeks, or until August 26, 2022, in which to resolve any objections, and if not, to file his appropriate objections to the *Presentence Investigative Report*.

**RESPECTFULLY SUBMITTED,** this, the 15th day of August, 2022.



PHILIP MANSOUR, JR. (MSB #1857)  
*Attorney for Defendant, Scott E. Nelson*

OF COUNSEL:

MANSOUR & ADAMS  
143 North Edison Street  
P. O. Box 1406  
Greenville, MS 38702-1406  
Phone: (662) 378-2244  
Fax: (662) 378-2246  
Email: [phil@mansouradams.com](mailto:phil@mansouradams.com)

*Certificate of Service*

I hereby certify that on August 15, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Clayton A. Dabbs, Esq.

[clay.dabbs@usdoj.gov](mailto:clay.dabbs@usdoj.gov)

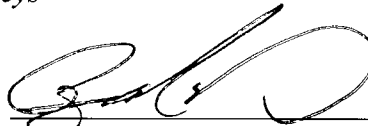
Robert J. Mims, Esq.

[robert.mims@usdoj.gov](mailto:robert.mims@usdoj.gov)

Kimberly Hampton, Esq.

[kimberly.hampton@usdoj.gov](mailto:kimberly.hampton@usdoj.gov)

*Assistant United States Attorneys*

A handwritten signature in black ink, appearing to read "Philip Mansour, Jr.", is written over a horizontal line.

Philip Mansour, Jr.